

**CAMERON LAW**

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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CHELSEA JOHNSON-YOUNG, individually,  
 Plaintiff,

vs.

WALMART, INC., a Foreign Corporation;  
 DOES I through X, inclusive; ROE  
 BUSINESS ENTITIES XI through XX,  
 inclusive,  
 Defendant.

Case No.: 2:24-cv-02228-BNW

**PROPOSED DISCOVERY PLAN AND  
 SCHEDULING ORDER**

**SPECIAL REVIEW REQUESTED**

The parties held a scheduling conference under Federal Rule of Civil Procedure 26(f) on February 5, 2025. The parties now submit their proposed discovery plan and scheduling order in compliance with LR 26-1(b).

1. **Discovery Cut-Off Date.** The first defendant answered or otherwise appeared on November 22, 2024. The Defendant removed the instant matter on December 2, 2024. The Parties propose **one year of discovery** from the removal, tentatively planned to close on **November 24, 2025<sup>1</sup>**. This proposed length of discovery exceeds the statutory 180 days from the date that the Defendant answered because of the Plaintiff's ongoing treatment. Discovery will likely involve procedure experts and medical or psychology experts. The Parties agree that this would be beneficial.

2. **Amending the Pleadings and Adding Parties.** The deadline to amend the pleadings and add parties is **August 26, 2025**.

3. **Expert and Rebuttal-Expert Disclosures.** The deadline to disclose experts is **September 25, 2025**. The deadline to disclose rebuttal experts is **October 27, 2025<sup>2</sup>**.

<sup>1</sup> November 22, 2025 is a Saturday.

<sup>2</sup> October 25, 2025 is a Saturday.

4. **Dispositive Motions.** The deadline to file dispositive motions is **December 24, 2025.**

5. **Pretrial Order.** The deadline to file a pretrial order is **January 23, 2026.**

6. **Fed. R. Civ. P. 26(a)(3).** The disclosures required by this rule and any objections to them must be included in the joint pretrial order.

7. **Alternative Dispute Resolution.** The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.

8. **Alternative Forms of Case Disposition.** The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

9. **Electronic Evidence.** The parties certify that they discussed whether to present evidence in electronic format to jurors for the purpose of jury deliberations.

10. **Initial Disclosures.** No changes are necessary in the form or requirement for the disclosures under Fed. R. Civ. P. 26(a). Initial disclosures will be made on or about **February 19, 2025.**

11. **E-discovery.** The parties agree that disclosure and discovery of electronically stored information should be produced in Portable Document Format (“PDF Format”) to allow for proper and consistent Bates numbering. The PDF documents are also to be produced in a recognize text Optical Character Recognition (“OCR”) format. If in good faith a party questions the authenticity of an electronically stored document, or for other good faith reason, the party may request the PDF format document to be produced in its native format.

12. **Extensions or modifications of the discovery plan and scheduling order.** In accordance with LR 26-3, any stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty-one (21) days before the discovery cut-off date. Therefore, such stipulations or motions shall be made not later than **November 3, 2025.**

13. **Email Service:** The parties consent to electronic service, to the extent the size of the submission permits it, of all court filings, not served through ECF (e.g., filings under seal) and such service shall constitute proper service under FRCP 5(b)(2)(E). The parties further consent to

1 electronic service of correspondence and discovery, in lieu of other service methods, under FRCP  
2 5(b)(2)(E) on all counsel who have entered an appearance on behalf of the party to be served.  
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4 Dated: February 19, 2025  
5 CAMERON LAW, PLLC

6 /s/ Daven P. Cameron  
7 Daven P. Cameron, Esq.  
8 Nevada Bar No. 14179  
9 *Counsel for Plaintiff*

Dated: February 19, 2025  
BURGER, MEYER & D'ANGELO, LLP

/s/ Curtis R. Rawlings  
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*Attorneys for Defendant Walmart, Inc.*

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14 IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

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16 DATED: February 20, 2025  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 19, 2025, I personally served a true and correct copy of the foregoing **PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER** on the party(s) set forth below by the following means:

☒ CM/ECF

Daven P. Cameron [daven@cameronlawlv.com](mailto:daven@cameronlawlv.com), [fileclerk@cameronlawlv.com](mailto:fileclerk@cameronlawlv.com)

Tabetha Martinez [tmartinez@burgermeyer.com](mailto:tmartinez@burgermeyer.com), [araleigh@burgermeyer.com](mailto:araleigh@burgermeyer.com)

☐ U.S. Mail

☐ Electronic Mail

☐ Hand-Delivery

☐ Delivery Services

☐ Other:

Dated February 19, 2025

/s/ Ebony S. Davis

An Employee of Cameron Law, PLLC